Cardillo & Corbett Attorneys for Plaintiff HEBEI EXPRESS SHIPPING CO., LTD. 29 Broadway New York, New York 10006 Tel: (212) 344-0464 Fax: (212) 797-1212 Tulio R. Prieto (TP-8455)

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

HEBEI EXPRESS SHIPPING CO., LTD.,

-against-

INTERNATIONAL ENERGY HOLDINGS GROUP: LIMITED d/b/a/ INTERNATIONAL ENERGY : HOLDING GROUP LTD.,

Defendant.

ECF

Plaintiff, : AFFIDAVIT PURSUANT TO SUPPLEMENTAL

RULE B

08 Civ. 326(10

STATE OF NEW YORK ) SS.: COUNTY OF NEW YORK )

TULIO R. PRIETO, being duly sworn, deposes and says:

1. I am a member of the Bar of this Court and a member of the firm of Cardillo & Corbett, attorneys for the Plaintiff herein. I am familiar with the facts of this case and make this affidavit in support of Plaintiff's prayer for the issuance of a Writ of Maritime Attachment and Garnishment, pursuant to Rule B of the Supplemental Rules for Certain Admiralty and Maritime Claims of the Federal Rules of Civil

Procedure.

- 2. I have attempted to locate defendant,
  INTERNATIONAL ENERGY HOLDINGS GROUP LIMITED, d/b/a
  INTERNATIONAL ENERGY HOLDING GROUP LTD., within this District.
  As part of my investigation to locate the Defendant within this District, I examined the telephone company information directory, as well as the white and yellow pages of New York listed on the Internet or World Wide Web, and did not find any listing for the Defendant.
- 3. The database of the office of the New York State Secretary of State was searched to determine if Defendant is qualified to do business in New York, without result.
- 4. On information and belief, Defendant,
  INTERNATIONAL ENERGY HOLDINGS GROUP LIMITED, d/b/a
  INTERNATIONAL ENERGY HOLDING GROUP LTD., was and still is, a
  foreign corporation, or other business entity, organized under,
  and existing by virtue of foreign law, with an address at Unit
  1101, Fourseas Building 208-212 Nathan Road, Kowloon, Hong
  Kong.
- 5. In consequence of these inquiries your deponent believes that the Defendant cannot be found within the Southern District of New York.
- 6. Upon information and belief, Defendant has, or will have during the pendency of this action, tangible and

intangible property within the District in the hands of ABN

Amro Bank NV, American Express Bank, Bank of America, Bank of

Communications Co. Ltd. New York Branch, Bank of New York,

Barclays Bank, BNP Paribas, Citibank, Deutsche Bank, HSBC (USA)

Bank, J.P. Morgan Chase, Standard Chartered Bank, UBS AG and/or

Wachovia Bank, in the form of accounts and/or fund transfers

identified as follows:

- a) accounts in the name of INTERNATIONAL ENERGY HOLDINGS GROUP LIMITED and/or INTERNATIONAL ENERGY HOLDING GROUP LTD., or
- b) electronic funds transfers listing INTERNATIONAL ENERGY HOLDINGS GROUP LIMITED and/or INTERNATIONAL ENERGY HOLDING GROUP LTD. as a beneficiary of the funds transfer, or
- c) electronic funds transfers showing INTERNATIONAL ENERGY HOLDINGS GROUP LIMITED and/or INTERNATIONAL ENERGY HOLDING GROUP LTD. as the remitting party or ordering customer.

WHEREFORE, HEBEI EXPRESS SHIPPING CO., LTD.

respectfully requests that the Court authorize the issuance of process in the form of a Writ of Maritime Attachment and Garnishment seeking attachment and garnishment of INTERNATIONAL ENERGY HOLDINGS GROUP LIMITED, d/b/a INTERNATIONAL ENERGY HOLDING GROUP LTD.'s, tangible and intangible property within

this District.

TULIO'R. PRIETO

Sworn to before me this  $14^{\text{th}}$  day of January, 2008

CHRISTOPHIL B. COSTAS
Notary Public, State of New York
No. 31-0773693
Qualified in New York County
Commission Expires April 30,